

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA AND  
THE STATES OF GEORGIA,  
LOUISIANA, TENNESSEE, AND  
VIRGINIA, EX REL. GREGORY  
FOLSE**

**v.**

**CARE SERVICES MANAGEMENT,  
LLC, ET AL**

**CASE NO. 17-cv-01478**

**DISTRICT JUDGE ALETA A.  
TRAUGER**

**MAGISTRATE JUDGE  
FRENSLEY**

**MOTION OF DEFENDANT’S COUNSEL TO WITHDRAW AS ATTORNEYS  
OF RECORD AND EXTENSION OF TIME TO RESPOND TO DISCOVERY**

Pursuant to Local Rule 83.01(g), Linda G. Rodrigue, and on behalf of Bradley C. Myers, and the law firm of Kean Miller LLP; and Jennifer L. Weaver and the law firm of Waller Lansden Dortch & Davis, LLP (collectively, “Movants”), respectfully move to withdraw as attorneys of record for Sally B Daly DDS LLC d/b/a Fleur de Lis Mobile Dental (“Fleur de Lis”). Movants respectfully represent the following.

Jennifer L. Weaver gave Notice of Appearance in this case on behalf of Fleur de Lis on March 8, 2021. (Doc. No. 73.) Bradley C. Myers and Linda G. Rodrigue were admitted *pro hac vice* to represent Fleur de Lis in this case on March 28, 2021. (Doc. No. 75.) Mr. Myers is no longer associated with the Kean Miller LLP law firm, and undersigned counsel for Kean Miller LLP confirms that Mr. Myers consents to his withdrawal from the case. Further, Linda G. Rodrigue and the law firm of Kean Miller, and Jennifer L. Weaver and the law firm of Waller Lansden Dortch and Davis, LLP have notified Sally B. Daly, the principal of Fleur de Lis, of their intention to withdraw as

counsel of record. A copy of the notice is attached to this Motion as Exhibit A. The withdrawal is with the consent of Fleur de Lis.

The trial in this matter is scheduled to begin February 20, 2024. The fact discovery deadline is January 27, 2023, and the expert discovery deadline is July 14, 2023. Accordingly, granting of this Motion will not delay proceedings in this matter.

Movants have conferred with counsel for all other parties regarding the Motion and have been advised by counsel for the Relator, for the State of Louisiana and for the State of Tennessee that they have no objection. To date, Movants have gotten no response from counsel for the other defendants or from the United States Attorney's Office.

Further, Movants represent that on August 24, 2022, Relator served written discovery on Fleur de Lis, and on August 25, 2022, the State of Louisiana served written discovery on Fleur de Lis. Movants respectfully request that Fleur de Lis be granted an extension of 30 additional days to respond to both parties' discovery requests. Movants have conferred with counsel for Relator and for the State of Louisiana and there is no objection by either of them to this request for an extension.

Accordingly, Movants request that the Court enter an Order granting the Motion to withdraw as attorneys of record for Fleur de Lis and granting Fleur de Lis 30 days'

additional time to respond to the discovery requests of Relator and the State of Louisiana.

Respectfully submitted:

/s/Linda G. Rodrigue

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## CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2022, I caused to be served the foregoing *Motion to Withdraw as Counsel of Record and Extension of Time to Respond to Discovery* on the following in the following manner: By CM/ECF:

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This 26th day of August, 2022.

/s/Jennifer L. Weaver